

Marlene S. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

May 18, 2018

Re: In The Matter Of Petition Of USTelecom For Forbearance Pursuant To 47 U.S.C. § 160 To Accelerate Investment In Broadband And Next Generation Networks, WC Docket 18-141, Ex Parte Communication, Letter In Support Of Motions For Extension Of Time

## Dear Ms. Dortch:

The National Association of State Utility Consumer Advocates ("NASUCA")<sup>1</sup> expresses support for the Motions for Extension of Time that have been filed thus far in this proceeding, by the National Association of Regulatory Utility Commissioners ("NARUC"), INCOMPAS, and the California Association of Competitive Telecommunications Companies ("CALTEL"). NASUCA also notes the letter in support of extension filed by the Midwest Association of Competitive Communications ("MACC").

NASUCA agrees with NARUC that "[t]he issues raised in the *USTelecom Petition* are complex and will, without question, impact, at some level, both competition and State regulatory authority and options." Hence the issues will also impact the *consumers* that NASUCA and its members represent. Further, NASUCA agrees with NARUC that "[t]he INCOMPAS, CALTEL, and MACC requests seek the absolute minimum extension necessary to permit a full analysis and response to the issues raised by the USTelecom Petition."

1

<sup>&</sup>lt;sup>1</sup> NASUCA is a voluntary association of 44 consumer advocate offices in 41 states and the District of Columbia, incorporated in Florida as a non-profit corporation. NASUCA's members are designated by laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. Members operate independently from state utility commissions as advocates for utility ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General's office). NASUCA's associate and affiliate members also serve utility consumers but are not created by state law or do not have statewide authority. Some NASUCA member offices advocate in states whose respective state commissions do not have jurisdiction over certain telecommunications issues.

<sup>&</sup>lt;sup>2</sup> NARUC Motion at 2.

<sup>&</sup>lt;sup>3</sup> Id.

The Commission should grant the requests for extension of time for comments in this proceeding.

David Springe, Executive Director NASUCA 8380 Colesville Road, Suite 101 Silver Spring, MD 20910 Phone (301) 589-6313 Fax (301) 589-6380

David C. Bergmann, Counsel 3293 Noreen Drive Columbus, OH 43221 Phone (614) 771-5979 david.c.bergmann@gmail.com